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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:17-cr-043-RFB
)	
Plaintiff,)	STIPULATION FOR PROTECTIVE ORDER
)	
vs.)	
)	
NICHOLAS J. NASH,)	
)	
Defendant.)	
)	
)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kilby Macfadden, Assistant United States Attorneys, and Defendant Nicholas J. Nash, and his counsel, Rene Valladares, Federal Public Defender for the District of Nevada, and Paul Riddle, Assistant Federal Public Defender, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, driver's license numbers, dates of birth, medical records, bank account numbers, and addresses of witnesses and

1 victims in this case. Such documents shall be referred to hereinafter as “Protected Documents.”

2 The parties state as follows:

3 1. Protected Documents which will be used by the government in its case in chief
4 include personal identifiers, including social security numbers, dates of birth, and addresses of
5 participants, witnesses and victims in this case.

6 2. Discovery in this case will exceed 700 pages. Given the nature of the allegations
7 and the facts and circumstances surrounding the crimes with which the defendant is charged,
8 that is, the defendant may use many of the documents in the discovery necessarily include
9 personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims
10 would prevent the timely disclosure of discovery to the defendants.

11 3. The United States agrees to provide Protected Documents without redacting the
12 personal identifiers of participants, witnesses, and victims.

13 4. Access to Protected Documents will be restricted to persons authorized
14 (authorized person) by the Court, namely the defendant, attorney(s) of record and attorneys’
15 paralegals, investigators, experts, secretaries, file clerks, law clerks, contractors, vendors, IT
16 Department, and copy centers employed by the attorney(s) of record or performing on behalf of
17 defendant.

18 5. The following restrictions will be placed on defendant, defendant’s attorney(s)
19 and the above-designated individuals unless and until further ordered by the Court. Defendants,
20 defendants’ attorneys and the above-designated individuals shall not:

21 a. make copies for or allow copies of any kind to be made by any other
22 person of the Protected Documents;

23 b. allow any other person to read the Protected Documents; and
24

1 c. use the Protected Documents for any other purpose other than preparing
2 to defend against the charges in the Indictment or any further superseding indictment arising out
3 of this case.

4 6. Defendant attorney shall inform any person to whom disclosure may be made
5 pursuant to this Order of the existence and terms of this Court's Order.

6 7. The requested restrictions shall not restrict the use or introduction as evidence of
7 discovery documents containing personal identifying information such as social security
8 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

9 ~~8. Upon conclusion of this action, defense counsel shall return to government~~
10 ~~counsel or destroy and certify to government counsel the destruction of all discovery documents~~
11 ~~containing personal identifying information such as social security numbers, drivers' license~~
12 ~~numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after~~
13 ~~the last appeal is final.~~

14 DANIEL G. BOGDEN
15 United States Attorney

16 /s/ Kilby Macfadden
17 KILBY MACFADDEN
Assistant United States Attorney

3/3/2017
DATE

18 /s/ Paul Riddle
19 PAUL RIDDLE
Assistant Federal Public Defender
20 Counsel for Nicholas J. Nash

3/8/2017
DATE

ORDER

21 IT IS SO ORDERED this 9th day of March, 2017.

22 
23 _____
24 ROBERT F. BOULWARE, II
UNITED STATES DISTRICT JUDGE